



Richard B. Rosenthal, Esq

August 29, 2023

Hon. Denise L. Cote, U.S.D.J.
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: Schottenstein et als. v. Lee et als., Case No. 22-cv-01197-DLC; Letter
Motion Request to Permanently Seal Documents with Personal Identifiers
and Substitute Them with Redacted Documents

Dear Judge Cote:

On August 18, 2023, I filed on behalf of the Plaintiffs in this matter a Motion for Partial Summary Judgment. Yesterday afternoon, it was brought to my attention that two documents [Dockets 84-9 and 84-10] comprising Exhibits to my forensic accountant's Declaration [Docket 84] contain personal identifiers, i.e., Social Security and Employer Identification Numbers, which were unfortunately overlooked at filing.

Working with the Attorney Help Desk within the Clerk's Office, I was able to arrange a temporary sealing of these offending documents during the late afternoon on August 28th. In accordance with Section 8.A. of your Honor's Individual Practices and *Federal R. Civ. Proc.* 5.2(a), I would have redacted these documents without the need to seek permission of the Court prior to filing had I realized that these personal identifiers were contained therein. In order to remedy this oversight, I am hereby requesting that these documents be ordered permanently sealed, and that the Court permit me to file redacted versions in substitution of the documents originally filed.

Approved.
[Signature]
9/6/23
All Counsel of Record (Via ECF)

Respectfully submitted,
/s/ Richard Bruce Rosenthal
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